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Attorneys for Countrywide Defendants
Countrywide Financial Corporation; Countrywide Securities Corporation;
Countrywide Home Loans, Inc.; CWABS, Inc. and CWMBS, Inc.

**UNITED STATES DISTRICT COURT
 CENTRAL DISTRICT OF CALIFORNIA**

IN re COUNTRYWIDE FINAN-
 CIAL CORP. MORTGAGE-
 BACKED SECURITIES LITIGA-
 TION

Case No. 11-ML-02265-MRP (MANx)

**DEFENDANTS' NOTICE OF MO-
 TION TO COMPEL AND JOINT
 STIPULATION REGARDING THE
 PARTIES' DISCOVERY DISPUTE**

IKB INTERNATIONAL S.A. IN
 LIQUIDATION, et al.,
 Plaintiffs,
 v.
 BANK OF AMERICA
 CORPORATION, et al.,
 Defendants.

Case No. 12-CV-06151-MRP (MANx)

Hearing Date: May 28, 2014
 Time: 1:30pm
 Courtroom: 12
 Judge: Hon. Mariana R. Pfaelzer

Close of Fact Discovery: July 25, 2014

[DISCOVERY MATTER]

**TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF
RECORD:**

PLEASE TAKE NOTICE that Defendants Countrywide Financial Corporation, Countrywide Securities Corporation, Countrywide Home Loans, Inc., CWABS, Inc. and CWMBS, Inc. move the Court for an order compelling Plaintiffs IKB International S.A. in Liquidation and IKB Deutsche Industriebank AG to provide a complete answer to the Countrywide Defendants' interrogatory seeking information regarding the misrepresentations pleaded in Plaintiffs' Complaint, specifically, the precise documents and statements that Plaintiffs contend were misleading, the individuals who allegedly relied upon each of those statements and the date on and manner in which such reliance occurred.

This motion is made pursuant to Rule 37 of the Federal Rules of Civil Procedure and Local Rule 37.2, following a conference of counsel as required by Local Rule 37.

This motion is based on this Notice of Motion and Motion, the Local Rule 37-2 Joint Stipulation, the accompanying Declaration of Matthew G. Lindenbaum and its exhibits, and any other matter that the Court deems appropriate.

Dated: May 7, 2014

GOODWIN PROCTER LLP

/s/ Brian E. Pastuszewski

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